

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

GRACE NEW ENGLAND; and

PASTOR HOWARD KALOOGIAN,

*Plaintiffs,*

v.

TOWN OF WEARE, NEW HAMPSHIRE;

TONY SAWYER, in his individual and  
official capacities; and

CRAIG FRANCISCO, in his individual and  
official capacities,

*Defendants.*

Civil Action No. 1:24-cv-00041-AJ

**DECLARATION OF HOWARD  
KALOOGIAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

I, Howard Kaloogian, declare and state as follows:

1. My name is Howard Kaloogian. I am over the age of 18 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this declaration.

2. I am ordained minister with Grace International and the Pastor for Grace New England (the "Church"), a small church plant that meets in my home on my property located at 217 Colby Road, Weare, New Hampshire 03281.

3. In 2015, I moved to my home in Weare, New Hampshire, which is situated on a five-acre plot consisting of two main buildings: my primary residence and a renovated barn.

4. The barn is located steps away from my primary residence and has stood on the property for 200 years. Since purchasing my property, I have made significant renovations to the barn, including exchanging the dance floor and bandstand for pews and a pulpit.

5. In 2023, I began prayerfully considering whether God was calling me to do more with my home to glorify His kingdom. Shortly thereafter, I felt a religious calling to start a church in my home. Thus, in the summer of 2023 I started the Church.

6. Since starting the Church, the barn has been primarily, and nearly solely, used for religious purposes, such as holding weekly Church services, weekly Bible studies, occasional Church-based Friday movie nights, and other related religious gatherings.

7. While the property also hosts public non-religious events, such as hosting the annual Pine Tree Riot, those events occur on an extremely limited basis and do not change the fact that the property, including the barn, has been primarily, and nearly solely, used for religious purposes since starting the Church in 2023.

8. For instance, since the Church started in 2023, the property, including the barn, has hosted well over 200 religious-based gatherings, including approximately 50 Church services a year, approximately 50 Bible studies a year, approximately 24 men's and women's Bible meetings a year, among other Church-sponsored potlucks and movie nights.

9. In contrast, since the Church started in 2023, the property has hosted less than 10 non-religious events, including approximately three political events (which typically occur every two-year election cycle) and one wedding (which may also be categorized as a religious gathering).

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of March, 2025.

By: /s/ Howard Kaloogian  
Howard Kaloogian